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Liaison Counsel for Class Representatives

[additional counsel listed in signature block]

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE CONDUENT INC. SECURITIES LITIGATION

Case No.: 2:19-cv-08237-SDW-AME

Hon. Susan D. Wigenton, U.S.D.J. Hon. André M. Espinosa, U.S.M.J.

NOTICE OF CLASS REPRESENTATIVES' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND <u>AUTHORIZATION TO PROVIDE NOTICE TO THE CLASS</u>

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that Class Representatives Oklahoma Firefighters Pension and Retirement System, Plymouth County Retirement Association, and Electrical Workers Pension Fund, Local 103, I.B.E.W (collectively, "Class Representatives"), on behalf of themselves and the certified Class, hereby move before Hon. André M. Espinosa, U.S.M.J., at the Martin Luther King Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure that, among other things: (i) preliminarily approves a settlement of this class action; (ii) approves the form and manner of notice of the proposed settlement to the members of the Class; (iii) appoints JND Legal

Administration as Claims Administrator; (iv) schedules a final settlement hearing; and (v) grants such other and further relief as the Court deems just and proper.

Defendants do not oppose the instant motion.

The motion is based on the accompanying Memorandum of Law in Support of Class Representatives' Unopposed Motion for Preliminary Approval of Class Action Settlement and Authorization to Provide Notice to the Class, and the Declaration of Richard L. Elem, dated December 2, 2022, with annexed exhibits, filed herewith.

A proposed Order Granting Preliminary Approval of Class Action Settlement, which was negotiated by the Parties to the Settlement, with annexed exhibits, is also submitted herewith.

Dated: December 2, 2022 Respectfully submitted,

/s/ Richard L. Elem

Jan Meyer Richard L. Elem

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Additional Counsel for Class Representatives

**CERTIFICATE OF SERVICE** 

I certify that on December 2, 2022, I caused the electronic filing of the foregoing Class

Representatives' Unopposed Motion for Preliminary Approval of Class Action Settlement and

Authorization to Provide Notice to the Class using the Court's CM/ECF system, which will be

sent electronically to the registered participants as identified on the attached Electronic Mail

Notice List.

/s/ Richard L. Elem RICHARD L. ELEM

4